# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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#### BRUCE ALLEN LILLER

Plaintiff \*

VS. \* CASE NO.: MJG-02-CV-3390 (Consolidated with MJG-02-CV-3391)

ROBERT KAUFFMAN, et al.

Defendants and Third-Party Plaintiffs

\*

v. ROGER LEE HELBIG

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Third-Party Defendant

\*

\* \* \* \* \* \* \* \* \* \* \* \*

## ANSWER TO DEFENDANTS MOTION IN LIMINE TO PRECLUDE TESTIMONY OF CHARLES COHEN, PhD.

Plaintiffs, Bruce Liller, Michael Liller, Mary Liller, and Dwight Liller, by and through their attorney, Arnold F. Phillips, Esq., says as follows:

1. That Plaintiffs deny the allegations made in Defendants Motion for reasons outlined in the attached memoranda.

/S/ Arnold F. Phillips, Esq PO Box 537 McHenry, MD 21541 (301) 387-2800

\*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 18<sup>th</sup> day of February, 2004, the foregoing was electronically mailed to:

Kathleen M. Bustraan, Esquire Jennifer S. Lubinski, Esquire Lord & Whip, P.A., **Charles Center South, 10<sup>th</sup> Floor** 36 S. Charles Street Baltimore, Maryland 21201 Attorney for Defendant's and Third-Party Plaintiffs

#### **AND**

Donald L. Speidel, Esquire Law Offices of Progressive Casualty Insurance Co. 800 Red Brook Boulevard Suite 120 Owings Mills, MD 21117

#### **AND**

Toyja E. Kelley, Esquire Tydings and Rosenberg, LLP **100 East Pratt Street** Baltimore, Maryland 21202.

#### Attachments

VITA of Jeroen Walstra Exhibit A

Exhibit B Cohen Report on Michael

Exibit C Cohen Report on Bruce

Exhibit E Plaintiffs Rule 26(a)(2)

Exhibit G Deposition pages of Cohen 48-50